

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:18-CR-621
	:	
Plaintiff,	:	
	:	JUDGE JAMES S. GWIN
vs.	:	
	:	
ALONSO BELTRAN-CAMPOS,	:	<b><u>RENEWED MOTION FOR BOND</u></b>
	:	<b><u>DUE TO CHANGE OF</u></b>
Defendant.	:	<b><u>CIRCUMSTANCES</u></b>

The Defendant, Alonso Beltran-Campos, by and through undersigned counsel and pursuant to 18 U.S.C. § 3145(b), requests this Court grant a bond, with reasonable conditions of release pending his sentencing.

Respectfully submitted,

STEPHEN C. NEWMAN  
Federal Public Defender  
Ohio Bar: 0051928

/s/ Jeffrey B. Lazarus  
JEFFREY B. LAZARUS  
Assistant Federal Public Defender  
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Attorney for Alonso Beltran-Campos

**MEMORANDUM**

Mr. Beltran-Campos was ordered to be detained by the Magistrate after a contested hearing. Dkt. 9. On November 5, 2018, Mr. Beltran-Campos asked this Court to review the Magistrate's detention order. Dkt. 12. This Court denied that motion on November 9, 2018. Dkt. 14.

Since that order, a change of circumstances has occurred. The government has indicated to the defense that no charges for harboring of illegal aliens would be filed. Knowing that no further charges would be filed, Mr. Beltran-Campos intends on pleading guilty to the charge on Monday, November 26, 2018 at 12:15 p.m. Given his forthcoming guilty plea, Mr. Beltran-Campos moves for a bond pending sentencing pursuant to 18 U.S.C. § 3143.

Throughout the detention proceedings, the government has solely and entirely relied on the possible harboring charges in support of their motion for detention. Now that such charges will not be filed, as there is no factual or legal support for such charges, a change of circumstances has arisen justifying renewable of the bond motion. Furthermore, given this Court's holding in *United States v. Veloz-Alonso*, Case No. 1:18-CR-464, Dkt. 21 (N.D. Ohio), the ICE detainer does not preclude him from receiving a bond.

In support of bond, Mr. Beltran-Campos has previously proffered that in September of 2017, Mr. Beltran-Campos married Ilze Jovaka Alcantar Borchardt, an American citizen, in the State of New York. A copy of their marriage license was entered as an exhibit at the detention hearing. Mr. Beltran-Campos's wife has an eight-year-old daughter, and Mr. Beltran-Campos cares greatly for her, is a good father to her, and provides for the family financially. It was further proffered that Mr. Beltran-Campos is the owner of a drywall company, which is a registered LLC in the State of Ohio. A copy of the certificate was also entered as an exhibit. Mr. Beltran-Campos

also has almost no prior criminal record, which consists of his prior deportation in Texas in 2014 and a single conviction for driving without a license in Tennessee in 2013.

Following Mr. Beltran-Campos's plea, defense counsel anticipates that his sentencing range will likely be zero to six months, which places him in Zone A, which does not recommend a prison term. To date, Mr. Beltran-Campos has already served two months in custody at the Cuyahoga County jail. Given his lack of fluency in English and his lack of criminal record, his time in the Cuyahoga County jail has been very difficult on him and his family. Given the sentencing range he is facing, granting a bond is appropriate. Also, given his work history, his ties to the community, and his lack of a criminal record, a bond is justified.

For these facts, and those detailed in his previously-filed motion for bond (Dkt. 12), Mr. Beltran-Campos requests this Court find that the government's decision not to charge him with harboring constitutes a change of circumstances, and that this Court consider granting him a bond pending sentencing. Mr. Beltran-Campos is neither a danger to the community nor a flight risk.

Respectfully submitted,

STEPHEN C. NEWMAN  
Federal Public Defender  
Ohio Bar: 0051928

/s/ Jeffrey B. Lazarus

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Attorney for Alonso Beltran-Campos

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2018, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. All other parties will be served by regular U.S. Mail.

/s/ Jeffrey B. Lazarus

JEFFREY B. LAZARUS

Assistant Federal Public Defender